

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

IN RE:

JOSEPH A. VAUDO

Debtor,

Chapter 13

Case No.: 19-13881

AFFIDAVIT IN SUPPORT OF MOTION TO EXTEND THE AUTOMATIC STAY

I, Joseph A. Vaudo, being duly sworn, do hereby depose and state the following:

1. I am a Debtor in Case No. 19-13881 which Chapter 13 bankruptcy petition was filed on November 12, 2019.

2. I filed the Chapter 13 bankruptcy petition because the individual who is secured against my home was trying to foreclose for the balance due to him. I want to be able to pay him in full and save my home located at 298 Route 6A Sandwich, Massachusetts.

3. I had one previous bankruptcy case pending within one year of the case herein on March 7, 2019 which was Case No. 19-10740 an individual Chapter 13 Bankruptcy case filed in the Eastern District of Massachusetts.

4. The previous case, Case No. 19-10740, was dismissed because due to the nature of my business in operating a fish market and the inconsistent income coming in, I was unable to afford the plan payment.

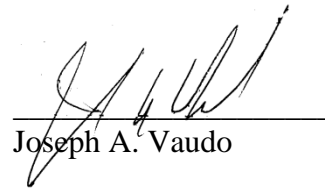
5. I am employed and receive sufficient income to make plan payments.

6. The change of circumstances between my Prior Case and the Present Case is that one of my properties located at 19 Grove Street Sandwich, Massachusetts was sold back in September 2019. From the sale I was able to pay approximately \$469,000.00 to Anthony Prevett, who is secured against all of my assets. In addition, I have been working diligently to sell my equipment at my business at 8 Gallo Road Sandwich, Massachusetts to be able to pay Anthony

Prevett the balance he is due. There is currently a seafood wholesaler who is interested in purchasing or leasing the building from my landlord, G-FOUR LLC, and they would also be interested in buying my equipment. As an auction was scheduled on my home, I needed more time to be able to sell my equipment.

7. My financial and personal affairs are such that bankruptcy case 19-13881 will be concluded with a confirmed plan that will be fully performed.

SWORN under the pains and penalties of perjury this 26th day of November, 2019.



Joseph A. Vaudo

Dated: November 26, 2019

CERTIFICATE OF SERVICE

The undersigned hereby certifies a copy of the above has been served by first class mail postage prepaid upon the creditors of record as set forth on the following pages.

/s/ Peter M. Daigle

Peter M. Daigle, Esquire

BBO # 640517

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(508) 771-7444

Dated: November 26, 2019

Electronic Mail:

Carolyn Bankowski, US Trustee

John Fitzgerald, Asst. US Trustee

J. Alexander Watt, Esquire for G-FOUR LLC

Robert Jachowicz, Esquire for Anthony Prevett

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John Kiernan

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Eastern Bank

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Massachusetts Department of Revenue

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Verizon

Verizon Wireless Bk Admin

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